Exhibit 5

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION KAREN LESTER, Plaintiff, V.) Case No. 2:23-cv-00624 WILEY COLLEGE, Defendant. (JURY DEMANDED) ZOOM VIDEOTAPED DEPOSITION OF MURIEL LEEWRIGHT Tuesday, December 10th, 2024 APPEARANCES For the Plaintiff: MR. MICHAEL PATRICK DOYLE DOYLE DENNIS AVERY, L.L.P. 3401 Allen Parkway, Suite 100 Houston, Texas 77019 Phone: (713)571-1148 Email: service@doylelawfirm.com For the Defendant: MS. AVVENNETT GEZAHAN Jackson Lewis, LLP 500 N. Akard, Suite 2500 Dallas, Texas 75201 Avvennett.Gezahan@jacksonlewis.com

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

Reported by: Janice J. Broussard, CSR, RPR

```
I N D E X
 1
 2
    WITNESS FOR THE PEOPLE:
                                                         PAGE
 3
 4
    MURIEL LEEWRIGHT
             Direct Examination by MR. DOYLE..... 4
 5
             Cross-Examination by MS. GEZAHAN..... 20
 6
 7
 8
 9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

```
I N D E X (continued)
1
2
3
4
                      EXHIBITS
   Description
5
6
         Exhibit 4 ..... Page 10
7
         (Letter)
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

1 THE VIDEOGRAPHER: Today is Tuesday 2 December 10th, 2024. We're on the record at 10:09 3 a.m. 4 MURIEL LEEWRIGHT, 5 Called as a witness on behalf of the Plaintiff 6 herein, after having been first duly sworn, 7 testified as follows: 8 DIRECT EXAMINATION 9 BY MR. DOYLE: 10 Tell us your name please. 11 Ο. 12 Α. Muriel McDoogle Leewright. You work as an employee of the Department of Ο. 13 14 Public Safety and Corrections over in Louisiana? I do. 15 Α. What's your job there? Ο. 16 My current job is education director for the Α. 17 18 Department. How long have you been doing that? 19 Q. I have been with the Department since 2015. 20 started at one of our state facilities instructing the 21 high school equivalency course classes, and then 22 transitioned to headquarters in 2017 overseeing our 23 24 local jails in the south part of the state, and then transitioned in to the state education coordinator; and 25

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

4

MURIEL LEEWRIGHT - December 10, 2024

someone there to just kind of be -- you know, just there to answer questions if they had any about just different things, but not to provide instruction.

They might help them out with a math problem or answer a question or look at something like that, but they are not there to instruct.

- Q. In your dealings with Wiley College, did you ever get any kind of, what you believe, a legitimate explanation for their doing what they were doing with these Federal funds?
- A. Yeah. I mean, they had a great explanation for everything. Any time we had an issue like that, it sounded okay, but then at the end it just got to where we just were concerned. You know, we at one time had one student that was Pell funds, applied for Pell, and then he was never enrolled in the program.

We did work that out where he was released from that and his funds were taken off. But what if we wouldn't have noticed that? We pay close attention to our students who're enrolled in programs. And we have to give credit or units for that, because they know who's in class and who's not. We're in headquarters, you know. So they are able to -- they are the boots on the ground who can tell us: Hey, look, they're taking Pell funds for her to be in this program, but she's not

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

MURIEL LEEWRIGHT - December 10, 2024

And this was after Wiley College received the

1

16

17

18

19

20

21

22

23

24

25

Q.

2	letter on February 6th?
3	A. Right. So on February 6th Secretary Leblanc
3	iii nighe. So sh residui, sen seoresur, sesiano
4	sent a letter, and then I received notification at the
5	end of February I can't tell you an exact date
б	kind of a close out plan of what was going to happen;
7	and that was to be finished in March of 2023.
8	And I believe we continued trying to get
9	things through the end of May, June. But, yes, we had
10	that close out that we received the end of February.
11	Q. Okay. And the person that was handling the
12	close out was Dr. Bradley?
13	A. That's correct.
14	Q. Okay. So prior to Dr. Bradley, you don't know
15	who was handling enrollment and providing that

- who was handling enrollment and providing that information to the registrar's office.
- A. I don't. I'm not able to provide that. You know, I do know that at some -- our facilities had some say in who was enrolled because they had to have a certain level of reading score, and different things like that, but as far as, you know, anything at Wiley College I do not know.
- Q. Okay. Do you know who at Wiley was responsible for informing Wiley's financial aid department of who was getting the Pell grants and who was enrolled in the

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

1	classes?
2	A. I do not.
3	Q. Okay. So you said you know that the students'
4	funds were misused, and they were misused for fraud.
5	How do you know that to be true?
б	A. Well, maybe those were my words. But, I guess,
7	my point is, is if someone is being told that they are
8	going to have the opportunity to receive a college
9	degree, associate's or bachelor's, and they are not
10	provided with the courses needed, or they are not
11	provided with the content on devices where it's
12	delivered, or they are not provided with accurate
13	transcripts, then their funds are not being used
14	appropriately.
15	Q. Okay. So do you know if did you ever
16	question Dr. Johnson about the misuse of financial aid
17	funds?
18	A. I think our questions about the programs to him,
19	you know, provided that. I mean, I wouldn't think I
20	would have to sit there and tell him
21	MS. GEZAHAN: Objection, nonresponsive.
22	Q. (By Ms. Gezahan) So my question is, did you
23	ever question Dr. Johnson
24	MR. DOYLE: Ma'am, please, just please
25	let her finish. It's perfectly fine to do an

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

1	objection, but she hadn't finished yet.
2	THE WITNESS: I don't recall saying those
3	exact words to Dr. Johnson.
4	Q. (By Ms. Gezahan) Okay. Did you ever talk to
5	Dr. Cox about concerns of Federal funds the
б	financial aid funds being misused?
7	A. Talk to who?
8	Q. Dr. Cox.
9	A. No. I've had very little dealings with Dr. Cox.
10	Q. Okay. And at the end with Dr. Bradley, did you
11	ever discuss with her that you believed that the Pell
12	grant funds were being misused?
13	A. Well, we were concerned about our students' Pell
14	grants, yes, we were, so yeah.
15	Q. Did you address that with her directly?
16	A. I don't recall if I used those exact words. I'm
17	not going to say.
18	Q. Okay. And it sounds like you had serious
19	concerns. Did you report those concerns to the
20	Department of Education?
21	A. I did.
22	Q. And did the Department of Education do an
23	inquiry?
24	A. I don't know. We were to have a visit, a Zoom
25	with the Department of Ed in October of 2022, I

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

```
believe, and it was canceled. And so at that time I
 1
 2
    don't know what happened. And I don't know if that
     call was for that reason, but we were ready to be on
 3
     the Zoom and it was cancelled.
 4
            Okay. And after you sent a letter in February
 5
    of 2023, did you report those concerns again to the
 6
     Department of Education?
 7
            I don't recall. I'd have to look back. I don't
      Α.
 8
     recall if I did anything after that point.
 9
          Okay. And then after the February 6th, 2023,
10
    letter has the Department of education contacted you,
11
    or from your knowledge anyone in your office about
12
    misuse of Federal funds?
13
14
      A. No.
15
          Okay.
      0.
          Not to my knowledge.
16
      Α.
      Q. Okay. And you did say that there was a student
17
    with -- you know, you guys looked into it, but Wiley
18
    did return those Federal funds, to your knowledge?
19
20
      A. Yes.
                   MS. GEZAHAN:
                                Okay. That's all of the
21
     questions that I have for you.
22
                   MR. DOYLE: Ms. Leewright, I don't have
23
24
     any further questions. And it's the same question
25
      that we had for Ms. Buttross, you get to make your
```

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com

```
1
2
                      REPORTER'S CERTIFICATE
         The transcript in the above-captioned case was
 3
     produced from my stenographic notes taken in my
 4
     capacity as Registered Professional Reporter, County
5
     El Paso, State of Colorado, at the time and place above
6
     set forth.
7
         Dated at Colorado Springs, Colorado, this 19th day
8
      of February 2025.
9
10
                                 /S/ Janice Broussard
11
                                Janice Broussard, RPR
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

WWW.MILLER-REPORTING.COM - 713-581-7799/877-721-6416 Email: Depositions@Miller-Reporting.Com